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August 19, 2019

**VIA ECF**

Honorable Carol Bagley Amon  
United States District Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.*,  
19-cv-007 (E.D.N.Y.)**

Dear Judge Amon:

Plaintiffs submit this letter in response to Defendants' requests for a pre-motion conference set forth in their August 16, 2019 letters, ECF Nos. 110 and 111, in advance of their contemplated motions to dismiss the First Amended Complaint (the "FAC").

Subject to the Court's approval, Plaintiffs agree to the briefing schedule proposed in Defendants' joint letter (ECF No. 110). Plaintiffs do not object to Defendants submitting a single joint brief, not to exceed 50 pages, addressing issues common to all Defendants, and take no position with respect to page limits pertaining to Defendant-specific supplemental briefs, as Plaintiffs do not know how many briefs Defendants will ultimately proffer or how many pages those briefs will contain.

In all material respects, Plaintiffs disagree with Defendants' characterizations of the allegations set forth in the FAC and submit that laundering billions of dollars in bulk cash (much of it through the United States) for, *inter alia*, Hezbollah's (U.S.-designated) narcotics traffickers and convicted weapons traffickers cannot be fairly characterized as "routine banking services" – at least in the United States.

Respectfully submitted,

/s/ Gary M. Osen